

THE UNIVERSITY OF ALABAMA IN HUNTSVILLE

HAZARD COMMUNICATION POLICY

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Division Vice President for Research and Economic Development – Office of Environmental Health and Safety (OEHS)

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Purpose The purpose of the UAH Hazard Communication Program is to ensure that all UAH employees who use hazardous chemicals are provided with the information relating to those hazards. This program is designed to assist university departments, units, and working groups to meet the compliance requirements of the Occupational Health and Safety Administration (OSHA) Hazard Communication Standard.

Policy

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UAH Hazard Communication Program

Introduction

The Occupational Safety and Health Administration (OSHA) enacted the Hazard Communication Standard, 29 CFR 1910.1200 in 1988. The Standard requires that the hazards of all chemicals be evaluated and that the information concerning their hazards is transmitted to employers and employees. The regulation stipulates employers develop a hazard communication program that describes the methods used to convey this information to employees. The program must include the use of material safety data sheets, labeling and employee training.

The University of Alabama in Huntsville (UAH) written Hazard Communication Program (HazCom) describes the methods used to ensure employees are provided with the appropriate chemical hazard information. This program establishes rights and responsibilities for departments, supervisors, and employees to accomplish the above task.

Purpose

The purpose of the UAH HazCom Program is to ensure that all UAH employees who use hazardous chemicals are provided with the information relating to those hazards. This written program describes in detail how, that information is transmitted to employees.

This program is designed to assist university departments, units, and working groups to meet the compliance requirements of the Occupational Safety and Health Administration (OSHA) Hazard Communication Standard.

Scope

This Hazard Communication (HazCom) Program applies to all UAH Departments, units, groups and employees at risk of occupational exposure to hazardous chemicals present in the workplace. The program applies to any hazardous chemical that is known to be present in the workplace in such a manner that employees may be exposed under normal conditions of use or in a foreseeable emergency.

Program Responsibilities

UAH

It is the responsibility of UAH, as an employer, to take every reasonable precaution to provide a work environment that is free from recognizable hazards and therefore, UAH fully supports this Hazard Communication Program.

Office of Environmental Health and Safety

The OEHS is responsible for the development and administration of the UAH Hazard Communication Program. OEHS will:

- Serve as the university authority and source of information for the UAH Hazard Communication Program
- Develop and evaluate the written UAH Hazard Communication program
- Provide consultation, exposure evaluation, industrial hygiene surveys, workplace assessments or other services as needed or requested by departments or supervisors

Departments

Departments whose employees may be exposed to hazardous chemicals are responsible for providing the necessary and appropriate resources, including personnel, equipment and financial support to ensure that a proper hazard communication plan is developed and implemented. The departmental responsibilities include:

- Assign Responsible Supervisor(s) for the affected area(s)
- Provide all necessary resources to implement an effective Hazard Communication Plan (i.e. storage for SDSs, labels, signs)
- Provide appropriate engineering controls as feasible
- Ensure continuity of recordkeeping, especially when supervisors leave or are reassigned.

Responsible Supervisors

The Responsible Supervisor (i.e. PI, supervisor, foreman, project director, or manager) is ultimately responsible for ensuring that the UAH Hazard Communication plan is understood and followed by the employees under their supervision. While the supervisor is *responsible* for implementing each of the elements described within the written Hazard Communication Plan, it is permissible

to delegate some tasks to other capable employees, provided the roles are clearly documented and understood. Responsible Supervisors must:

- Identify and list in the chemical inventory all hazardous chemicals as defined under this program, used or generated in their work area during the routine operations
- Collect and maintain SDSs for each hazardous chemical used or created in the work area

- Ensure all hazardous chemical containers are properly labeled
- Identify all the employees who may be exposed to hazardous chemicals in their work area
- Provide appropriate protective measures including engineering controls, administrative controls and/or Personal Protective Equipment (PPE) for each employee
- Ensure that each of their employees receives Hazard Communication training, consisting of both general and unit specific chemical hazard information; including non-routine work activities and emergencies
- Ensure the training documents are maintained and available for audits upon request
- Provide on-going training when new chemical hazards are introduced and when new employees may encounter chemical hazards
- Ensure employees are informed of chemical hazards they may encounter due to contractor(s) activities in the area, and inform contractors of chemical hazards they may encounter in UAH facilities
- Conduct ongoing work-site evaluations and recordkeeping reviews as necessary to ensure that the written plan is effectively implemented.

Employees

All employees working with hazardous chemicals must accept responsibility for operating in a safe manner. Employees also have the responsibility to read and understand the written HazCom program and undergo all required trainings. Employees are responsible for informing their supervisors of any working conditions, exposures, accidents and work practices they may believe will be hazardous to their health or health of others.

Employees are responsible for the following:

- Attending Hazard Communication training
- Handling hazardous chemicals in accordance with instructions on the label and on the SDS.
- Labeling containers appropriately when transferring hazardous chemicals to secondary containers
- Practicing safe work habits
- Notifying their supervisor of unsafe conditions

Chemical Inventory

The supervisor or designee is responsible for identifying and listing all hazardous chemicals, used or generated in their work area, in the chemical inventory.

The chemical inventory also serves as a list of all materials for which a SDS must be maintained, and is the initial step, necessary for completion of the rest of the program. Compiling the chemical inventory is not a one-time effort. Like all components of the HazCom plan, the inventory must be updated annually and as needed by adding new chemicals to the list and removing the ones depleted or discarded. SDSs must be updated whenever chemicals are substituted or new chemicals are brought on site. UAH chemical inventories are maintained online using [US SDS](#). Additional information about the chemical inventory process can be found on the OEHS website.

Preparing the Chemical Inventory

The first step in preparing a chemical inventory is to survey the workplace. This includes identifying hazardous chemicals in containers, storage units, processing units, and tanks. The broadest possible perspective should be taken when doing the survey. Often "chemicals" are thought of as being only liquids in containers. The HazCom program covers chemicals in all physical forms - liquids, solids, gases, vapors, fumes, and mists - whether they are "contained" or not. The hazardous nature of the chemical and the potential for exposure are the factors that determine whether a chemical is covered. If it's not hazardous, it's not covered. If there is no potential for exposure (e.g., the chemical is inextricably bound and cannot be released), the rule does not cover the chemical. If you have questions about specific items please contact the OEHS.

Contaminants generated in the workplace such as welding fumes (generated when welding metals) and dusts (sawing or sanding wood) are also potential sources of exposure, and must be listed on the chemical inventory.

Identifying Hazardous Chemicals in the Work Area

A key component of the hazard communication program is differentiating between hazardous and non-hazardous materials. The primary responsibility for evaluating hazards of chemicals is placed on the manufacturers and importers. They are required to evaluate each chemical they produce or import for physical or health hazards. If a chemical meets any of the criteria for a physical or health hazard, the manufacturer must **label** the container with hazard information. Any chemical or product that has been determined by the manufacturer to be a hazardous chemical (i.e. label gives hazard warning information) must be included in the Chemical Inventory, unless it is exempt (see exempted materials list below).

Exempted Materials

The OSHA standard exempts a number of items, which therefore do not have to be included in the HazCom Plan or to be listed in the Chemical Inventory.

- Any consumer product, which is used in the work place as intended by the manufacturer, and used in the same manner of a typical consumer.
- Articles, if under normal conditions of use does not release more than trace amounts of a hazardous chemical and does not pose a physical or health hazard to employees. (for example: stainless steel table, vinyl upholstery, tires, adhesive tape)
- Wood or wood products which would not be processed (chemically treated wood that would be sawed or cut, generating dust and potential exposure, is not exempt)
- Food or alcoholic beverages, intended for retail sale or personal consumption
- Any drug when in solid final form, for direct administration to patients (pills, or tablets) or packaged for sale to consumers (e.g. over-the-counter drugs) and drugs intended for personal consumption
- Cosmetics, packaged for sale to consumers and cosmetics for personal use
- Tobacco or tobacco products
- Nuisance particulates
- Ionizing and non-ionizing radiation
- Biological hazards
- Hazardous waste (see [UAH Hazardous Waste Management Plan](#) for additional information)

Hazardous Chemical

OSHA defines a hazardous chemical as any chemical that is a physical hazard or health hazard.

Physical Hazards

Physical hazard means a chemical that is a combustible liquid, a compressed gas, explosive, flammable, an organic peroxide, oxidizer, pyrophoric, unstable (reactive) or water- reactive.

Health Hazards

Health hazard means any chemical that causes acute or chronic health effects in exposed employees. It includes chemicals that are carcinogens, toxic or highly toxic agents, reproductive toxins, irritants, corrosives, sensitizers, hepatotoxins, nephrotoxins, and neurotoxins, agents that can act on the hematopoietic system and agents that damage the lungs, skin, eyes or mucous membranes.

Safety Data Sheets (SDS)

The supervisor or designee will ensure that Safety Data Sheets are available for every hazardous chemical used in the work area and are accessible to employees on all work shifts.

The official copy of UAH chemical inventories is the one maintained by OEHS on [US SDS](#). If the supervisor or designee can also maintain a separate inventory if they so choose, but the inventory that is on [US SDS](#) must always be kept up to date. Rules that must be followed in maintaining SDSs are:

- Current SDSs are maintained and are checked regularly (indicate time frame, as appropriate for chemical use, minimum is annual) to ensure there is a corresponding and current SDS for each chemical on the Chemical Inventory
- If there are SDSs for chemicals that are not on the Chemical Inventory, or the reciprocal, the supervisor or designee will determine the reason for the discrepancy (i.e. the chemical is no longer used, chemical overlooked during inventory) and take the necessary corrective action
- An SDS must be provided with or prior to the initial shipment of any hazardous substance and with or before a shipment arrives the campus, the SDS must be updated
- If an SDS is needed from the supplier, the supervisor or designee will contact the supplier by telephone and request the missing SDS be sent via e-mail, fax or regular mail.
- When an SDS is received, review it for changes in health and safety information, notify employees of changes as needed, file and add to the Chemical Inventory as appropriate
- Store old SDSs for chemicals that are no longer in use or no longer present in the work in an archive file, indicating the dates the material was used.

SDSs must follow the format mandated by OSHA in 2014. The employer is responsible for providing translated SDSs for non-English speaking employees.

SDSs must contain the following information:

- Section 1: Identification
- Section 2: Hazard(s) Identification with Hazard Pictograms
- Section 3: Composition/Information on Ingredients
- Section 4: First-Aid Measures
- Section 5: Fire-Fighting Measures
- Section 6: Accidental Release Measures
- Section 7: Handling and Storage
- Section 8: Exposure Controls/Personal Protection
- Section 9: Physical and Chemical Properties
- Section 10: Stability and Reactivity
- Section 11: Toxicological Information
- Section 12: Ecological Information
- Section 13: Disposal Considerations
- Section 14: Transport Information

- Section 15: Regulatory Information
- Section 16: Other Information

Employees **are not to use any hazardous chemical until an SDS is obtained**, and they have been instructed in the chemicals hazards and safe handling methods.

An SDS contains information that is very technical. Moreover, it is essential that the supervisor understand the significant information about each chemical to ensure employees are provided with appropriate information for the safe handling and use to reduce the risk of chemical exposure. The Office of Environmental Health and Safety is available to help supervisors understand the information contained on an SDS.

Some suppliers provide SDSs for non-hazardous products; however, these SDSs do not need to be maintained, but may be advisable, to document the absence of hazardous components.

If a sales person supplies a sample of a hazardous chemical product, the container must be labeled, an SDS must accompany the product if the product is used, and it should be listed on the chemical inventory.

Labels

Labels provide an immediate warning of the hazards which employees may be exposed and provide a link to more detailed information (i.e. SDS).

OSHA requires that all hazardous chemicals be labeled appropriately to convey the correct hazard information to employees. It is the responsibility of the manufacturer or importer to ensure that all information is accurate. The responsible supervisor or the designee must ensure these containers are properly labeled when they arrive on site and that they remain so throughout their use.

The supervisor or designee will ensure that every container entering the work site bears the required label. The label must include the:

- Identity of the chemical
- Appropriate hazard warnings, including target organ effects
- Name and address of the manufacturer, importer or distributors

Hazard Warnings

Hazard warnings on labels may consist of words, pictures, symbols, or a combination thereof, which provide the specific physical or health hazards, including target organ effects, of the chemicals in the container.

Never work with a chemical until you understand the potential hazards and know how to handle it safely.

The label is intended to be an immediate visual reminder of the hazards of the chemical in the container. It is not necessary that every hazard presented by a chemical be listed on the label. The SDS is used for this purpose.

Products that are subject to EPA regulations (i.e. insecticides, fungicides, rodenticides, and disinfectants) and FDA regulations (i.e. food, food additives and drugs) must be labeled according to those agencies regulations. There is no need to re-label these containers for Hazard Communication compliance.

Primary Containers

The primary information to be obtained from an OSHA-required label is an identity (name) for the material, and appropriate hazard warnings. The identity is any term that appears on the label, the SDS and the list of chemicals, and thus links these three sources of information. The identity used by the supplier may be a common or trade name ("Joe's Formula 13"), or a chemical name (Acetone). The hazard warning is a brief statement of the hazardous effects of the chemical ("flammable," "causes lung damage"). Labels frequently contain other information, such as precautionary measures ("do not use near open flame"), but this information is provided voluntarily and is not required by the rule. Labels must be legible, and prominently displayed.

Secondary Containers

If any chemical is transferred to another container, the new or secondary container must be labeled. The label on the secondary container must contain the same information required for the label on the original container along with the date the chemical was added to the secondary container and the name of the person responsible for the secondary container. There are several acceptable methods to label a secondary container:

1. Applying a photocopy of the original label to the secondary container
2. Applying a duplicate label provided by the manufacturer
3. Applying a legible handwritten label

Secondary Labeling Exemption

It is not necessary to label the secondary container if the employee who performs the transfer is the *only person* who uses the chemical from the new container and the chemical is entirely used during their work shift.

However, it is highly recommended that all containers be labeled to avoid confusion and possible harm to employees. This recommendation includes non-hazardous chemicals as well. For example, an unlabeled container of distilled water may look similar to a container of Isopropyl Alcohol, and labeling in this instance would be clearly helpful in distinguishing the two.

In situations where a tank truck, rail car or similar vehicle comprises the container for a hazardous chemical, the labeling information may be posted on the outside of the vehicle or attached to the accompanying shipping papers or bill-of-landing. A label may not be sent separately, even if prior to shipment.

In-house containers such as pipes, storage tanks and process vessels containing hazardous chemicals must also be labeled. Alternative labeling systems can be used, as long as it is readily available to the employees in the area throughout each work shift. This does not include SDSs in lieu of labels.

Other forms of labeling include:

- Signs
- Placards
- Process Sheets
- Batch Tickets
- Operating Procedures

Non-Routine Tasks and Emergencies Involving Hazardous Chemicals

Periodically employees may be required to perform non-routine tasks (e.g., infrequent cleaning operations, maintenance activities, special projects, etc.) in which they may encounter hazardous chemicals.

Prior to the start of a non-routine project, the supervisor or designee will provide training for each affected employee, including specific hazards of the materials that he or she may encounter during the activity.

The hazard information will include protective measures the employee can use such as PPE, and what safety measures may be used including ventilation, air monitoring, buddy systems, emergency rescue procedures, confined space entry procedures.

Supervisors should plan for foreseeable emergencies (e.g. spills, fires, power outages, etc.) and train employees on the appropriate actions.

Working with Contractors

Outside contractors are utilized by many UAH departments for a variety of activities including: construction, renovation, testing and maintenance. There is a reciprocal responsibility between UAH and the contractor to fulfill the requirements of the Hazard Communication Standard.

The UAH employee who coordinates/oversees the work of a contractor must advise the contractors of their responsibility to provide appropriate hazard information (SDSs) for all hazardous chemicals brought onto UAH.

Likewise, it is the responsibility of that individual to provide the contractor with information about the hazardous substances to which they may be exposed while at a UAH site and if applicable, the labeling system in use, protective measures to be taken, safe handling procedures, and the location and availability of SDSs.

Building-Related Hazards

Contractors and Physical Plant personnel perform the majority of renovation work in UAH buildings. However, employees in other units may also need to intrude installed building materials for various purposes, so this information applies universally.

Asbestos

Asbestos fibers were added to many building materials prior to the 1980's before the uses of asbestos were banned. Pipe insulation, floor tile, ceiling tile/board, drywall/joint compound, laboratory cabinet tops, transite board, glues, mastics and caulks are some of the more common building materials that may contain asbestos fibers. When left intact and undisturbed these materials do not pose a health risk to building occupants. Asbestos fibers may cause cancer and lung disease if disturbed and inhaled in sufficient quantity.

At UAH the (OEHS) provides asbestos management and coordinates most abatement services. Before disturbing any suspect building materials contact OEHS for asbestos information or testing.

Lead Based Paint

Lead-based paint (LBP) may be present on surfaces in pre-1978 buildings. Although LBP chips can be a hazard to young children who eat the chips, the primary concern for adult exposure is fine dust, where inhalation or accidental ingestion of lead dust in sufficient quantity can affect the blood or nervous system. Avoid disturbance of LBP that creates a fine dust (power sanding, saw cutting, etc.). If renovation of a painted surface may create fine dusts, contact OEHS for LBP testing.

Silica

Many building materials contain silica sand – cement, concrete, brick, mortar, etc. While sand particles themselves are not a hazard, very fine dusts of crystalline silica may cause lung disease. Although drilling a few holes does not create a significant hazard, extensive use of power tools on these materials must include dust control measures. In addition, there should be no dry sweeping of residual dusts and only vacuums cleaners with high efficiency filters may be used.

Training

Each employee who works with, or is potentially exposed to hazardous chemicals will receive initial and periodic training on the Hazard Communication Standard and the safe use of those hazardous chemicals.

The employee's supervisor or designee is responsible for ensuring that each employee receives the appropriate Hazard Communication training, including both general and unit-specific training and must maintain documentation of all training.

General HazCom Training

OEHS will provide General Hazard Communication training for UAH employees, which will include the following topics:

- A general training course on the Percipio Training Software covering the OSHA Hazard Communication Standard or a training course using CITI, depending on the employee classification.
- An explanation of the UAH Hazard Communication Plan, and its location and availability
- The chemical and physical properties of hazardous materials (e.g. flash point, vapor pressure, reactivity) and the methods that can be used to detect the presence or release of chemicals
- The physical hazards of chemicals (e.g. potential for fire, explosion)
- The health hazards of chemicals
- Methods and observations to detect the presence or release of hazardous chemicals, such as monitoring conducted by UAH OEHS, continuous monitoring devices, visual appearance or odor, etc.
- The procedures to protect against chemical hazards (e.g. engineering controls, such as ventilation; work practices, such as hand washing; personal protective equipment such as gloves; and emergency procedures)
- Pre-planning for non-routine tasks, spills and emergencies
- The importance of SDSs, accessibility and how to read and interpret the information on SDSs and labels

Unit-Specific Training

The supervisor must ensure all employees under his/her supervision are provided with the current hazard information for the chemical hazards that may be encountered.

The supervisor or the designee will conduct the unit- specific training focusing on the specific chemical hazards that employees may encounter. This training will be provided either before or at the time the employee is assigned to work with a hazardous chemical. Additional training shall be provided for employees whenever a new hazard is introduced into the work area. Unit-Specific training will include at a minimum:

- A review of the UAH Hazard Communication Plan
 - Location & accessibility of the SDSs, chemical inventory and written plans
 - Details of the departments labeling system
 - Hazards of the specific materials to which employees may be exposed
 - Protective measures to reduce exposure including PPE for use with hazardous chemicals (specific type, location, use, and maintenance), work practices, Location of Safety Showers/Eye Wash stations
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- Explanation of routine and non-routine tasks involving encounters with hazards chemicals
 - Emergency procedures involving hazardous materials

OEHS will periodically review the training program to ensure the documentation is current and appropriate for the existing conditions.

Recordkeeping

The Department must develop a plan to ensure the continuity of all recordkeeping when a supervisor leaves or is reassigned.

Training records

Records of Unit Specific HazCom training must be maintained by the supervisor and be readily available for inspection by OEHS. Records of general HazCom training are to be kept by OEHS either on Percipio or CITI, depending on the classification of the employee.

Safety Data Sheets

The supervisor is responsible for the SDSs for hazardous material currently used in the work place, which must be maintained and updated as described in this Hazard Communication Program, and must be retained for 30 years (per the Access to Employee Exposure and Medical Records Standard 29 CFR1910.1020).The 30-year retention is not required if the Chemical Inventory includes where and when the chemicals were used (CPL 02-02-038 Inspection Procedures for the Hazard Communication Standard).

Chemical Inventory

The Supervisor will ensure the list of hazardous material is current and accurately maintained. Each calendar year the supervisor will certify the chemical inventory on US SDS is up to date when OEHS reviews their Laboratory Specific Chemical Hygiene Plan.

Review The Director of the Office of Environmental Health and Safety (OEHS) will be responsible for the review of this policy every five years (or whenever circumstances require)